

UNITED STATES DISTRICT COURT

for the

Northern District of Oklahoma

FILED

SEP 22 2020

Mark C. McCartt, Clerk
U.S. DISTRICT COURT

In the Matter of the Search of

sealed USPS Priority Mail 2-Day parcel measuring approximately 12
 1/4" X 12 1/4" X 6", identified by tracking number 9505 5152 6777
 0256 7586 84 (herein referred to as "subject parcel"), from Zip Code
 95677 weighing approximately 2 pounds, 6.8 ounces and postmarked
 September 12, 2020. The parcel's return address is "Raymond Luna
 3702 Cone Ct. Rocklin, CA 95677", and is addressed to "Jacob
 Wilson 2633 E. 15th St Tulsa, OK 74104"

Case No.

20-mj-325-PJC

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment "A"

located in the Northern District of Oklahoma, there is now concealed (identify the person or describe the property to be seized):

See Attachment "B"

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section
 21 U.S.C. § 841(a)(1)

Offense Description
 Possession With Intent to Distribute Controlled Substances

The application is based on these facts:

See Affidavit of Robert Firkin, attached hereto.

- ☒ Continued on the attached sheet.
☐ Delayed notice of ____ days (give exact ending date if more than 30 ____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Sworn to before me and signed in my presence.

Date:

9/22/20

City and state: Tulsa, OK Tulsa, Oklahoma

Applicant's signature

Robert Firkin, USPS Postal Inspector

Printed name and title

Judge's signature

Paul J. Cleary, U.S. Magistrate

Printed name and title

AFFIDAVIT AND STATEMENT OF PROBABLE CAUSE

I, Robert Firkin, being duly sworn, do hereby depose and state:

1. Your Affiant is Robert Firkin, a duly qualified Inspector for the United States Postal Inspection Service (USPIS) who has over 12 years of law enforcement experience having been so employed by the USPIS since August of 2019. Prior to becoming an Inspector for the USPIS, your affiant was a deputy with the Stafford County Sheriff's Office (VA) for five years and a detective for the same for four years. Prior to the Stafford County Sheriff's Office, your affiant was an officer with the University of Georgia Police Department for one and a half years and an officer with the Atlanta Police Department (GA) for two years. Your affiant has received specialized training in the use of the U.S. Mails in narcotics investigations through the USPIS.

2. The information set forth in this Affidavit is known to me by other law enforcement personnel or through my own investigation.

3. This Affidavit is based upon the Affiant's personal investigation and upon information received from other law enforcement officers and agents and may not be inclusive of all evidence or information available, or of all facts known to me relative to this investigation. Rather, I have included facts which are necessary to establish probable cause that the parcel described herein contains controlled substances. This affidavit is made in support of an application for a search warrant to search and seize contraband, fruits, instrumentalities and evidence of crimes against the United States in violation of 21 U.S.C. § 841(a)(1) from a USPS Priority Mail 2-Day parcel originating in the city of Rocklin, CA. It is more specifically described as a sealed USPS Priority Mail 2-Day parcel measuring approximately 12 ¼" X 12 ¼"

X 6", identified by tracking number **9505 5152 6777 0256 7586 84** (herein referred to as "subject parcel"), from Zip Code 95677 weighing approximately 2 pounds, 6.8 ounces and postmarked September 12, 2020. The parcel's return address is "Raymond Luna 3702 Cone Ct. Rocklin, CA 95677", and is addressed to "Jacob Wilson 2633 E. 15th St Tulsa, OK 74104". The parcel is currently located at the USPS Tulsa Domicile (Northern District of Oklahoma).

4. I am aware through training, as well as information from other Postal Inspectors with extensive experience in drug trafficking investigations the United States Mail is a common and preferred method for drug traffickers to ship their product. United States Express Mail and Priority Mail are frequently used by drug dealers for not only shipping illegal drugs, but also for shipping the proceeds and money from illegal drug sales and purchases. Use of the United States Mail is favored because of the speed, reliability, and low cost of this service, as well as the perceived minimal chance of detection of illegal drugs, money, or financial instruments shipped in such a manner.

5. I am also aware that drug traffickers often use fictitious return addresses and names on return addresses, as well as real names and real addresses, with or without the actual person's knowledge or consent, to avoid detection in the event the parcel is intercepted by law enforcement officers. Parcels containing controlled substances often provide minimal information on the mailing label to avoid detection of a fictitious name or return address. Traffickers normally use heavy tape on the seams and corners of a parcel and have been known to use sealed containers and masking scents, to interfere with any drug detection canine's ability to detect the narcotics. It is common for traffickers to mail parcels from a different post office

than the one located in the Zip Code area used on the return address, also to avoid detection of fictitious information.

6. On the evening of September 16, 2020, your affiant was contacted by Tulsa Police Department (TPD) Narcotics Investigator Payton Laskey requesting your affiant contact TPD Officer Michael Snyder concerning the **subject parcel**. Your affiant was able to make contact with Officer Snyder by phone and ultimately responded to the Donaldson Station Post Office located at 1423 Terrace Dr. Tulsa, OK 74104.

7. At the Donaldson Station, Officer Snyder explained to your affiant he and his partner, Officer Will Mortensen, arrested brothers Christian Wilson and Everett Wilson in the course of a traffic stop earlier in the day. The arrest was based on a loaded handgun being located during a consent search of the vehicle in which Christian Wilson and Everett Wilson were travelling.

8. Officer Snyder further explained to your affiant that, during the booking process at David L. Moss Criminal Justice Center, Everett Wilson requested that Officer Snyder send text messages to various individuals utilizing Everett Wilson's cell phone. Officer Snyder advised while doing so, he began to see incoming text messages to Everett Wilson's cell phone that were indicative of narcotics activity. Officer Snyder advised in these text messages he saw the tracking number associated with the **subject parcel**.

9. When contacted by TPD Investigator Laskey and provided the **subject parcel's** tracking number your affiant was able to see the **subject parcel** was still out for delivery. Your affiant was then able to intercept the **subject parcel** at the Donaldson Station.

10. Your affiant was able to verify the return address of 3702 Cone Ct. Rocklin, CA 95677, as being a valid address. However, your affiant was not able to associate “Raymond Luna” with the return address according to records in CLEAR.


11. Furthermore, your affiant was able to verify the destination address of 2633 E. 15th St Tulsa, OK 74104 as being a valid address. However, this address belongs to suites and no suite number was listed on the **subject parcel**. Your affiant could not associate a “Jacob Wilson” with the destination address. Neither Christian Wilson nor Everett Wilson have the middle name, “Jacob.”

12. Through USPS business records your affiant was able to determine the payment for mailing the **subject parcel** was made in cash.

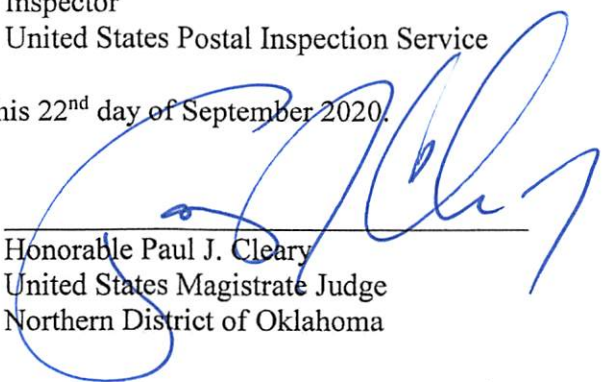
13. On September 21, 2020, your affiant contacted TPD Narcotics Investigator David Wamsley and his narcotics K-9, “Loki.” The **subject parcel** was placed on the workroom floor in the USPS Downtown Station, 333 West 4th Street, Tulsa, OK 74101, with the placement being next to four other parcels of various sizes spaced several feet apart. Detective Wamsley ran Loki over the parcels and advised your affiant that Loki alerted on the **subject parcel**. Detective Wamsley advised that he has been a certified dog handler for the TPD since October of 2000. Detective Wamsley advised that Loki is certified through the State of Oklahoma in the detection of narcotics odors, including marijuana, cocaine, heroin, and methamphetamine. Detective Wamsley advised that based on Loki’s alert, he believes that the Subject parcel contains illegal drugs, in violation of federal law.

14. Based on the foregoing, I believe there is evidence to show the parcel as described in paragraph three, was sent via the USPS in violation of 21 U.S.C. § 841(a)(1) and respectfully

request a warrant be issued authorizing the USPS to search and seize the mailing package as well as any controlled substances or items of dominion or control inside the package.


Robert Firkin
Inspector
United States Postal Inspection Service

by phone
Sworn and subscribed to before me this 22nd day of September 2020.


Honorable Paul J. Cleary
United States Magistrate Judge
Northern District of Oklahoma

ATTACHMENT "A"

SUBJECT PARCEL: a sealed USPS Priority Mail 2-Day parcel measuring approximately 12 ¼" X 12 ¼" X 6", identified by tracking number 9505 5152 6777 0256 7586 84 from Zip Code 95677 weighing approximately 2 pounds, 6.8 ounces and postmarked September 12, 2020. The parcel's return address is "Raymond Luna 3702 Cone Ct. Rocklin, CA 95677", and is addressed to "Jacob Wilson 2633 E. 15th St Tulsa, OK 74104"

ATTACHMENT "B"

Any controlled substances and evidence constituting ownership and intent to possess controlled substances and possess controlled substances with intent to distribute under Title 21, United States Code, Section 841.